

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2015 JUL 14 AM 10 19

STEPHAN HARRIS, CLERK  
CASPER

Jacqueline S Judd

Petitioner

CASE NO. 2:15-cv00064-SWS

U.S. House of Representative  
Cynthia Lummis

Respondent

**Opposition to Defendant's  
Motion to Dismiss**

Plaintiff, Jacqueline S Judd hereby submits its opposition to Defendant, House of Representative Cynthia Lummis' Motion to Dismiss the Complaint with Prejudice. Plaintiff, Jacqueline S Judd's complaint not only meets but exceeds the standards governing the form of a complaint contemplated by *Federal Rule of Civil Procedure 8(a)*, whereas this Court has jurisdiction in this matter, where the Complaint filed sufficiently alleges plaintiff, Jacqueline S Judd's harm and damages. Accordingly, Defendants' motion to dismiss should be denied.

Defendant, House of Representative Cynthia Lummis' move to dismiss Plaintiff's Complaint for Failure to file within 14 days of defendant's response is miss construed and false with the timing of mail of response, originating from Maryland, and being sent to the Plaintiff, Jacqueline S Judd, taking no less than 5/8 days to reach Plaintiff, for Plaintiff to respond to Defendant. Plaintiff, Jacqueline S Judd has responded as such within the timely manner allotted of the 14 days following receipt of Defendants rebuttals and oppositions. Plaintiff has retained the original envelopes of origin and dates, and stapled to each them as proof of evidence should the court request.

The Defendant, House of Representative Cynthia Lummis' lacks factual basis for her opposition with no valid support to their opposition, yet only a mere stall tactic for the hearing. The Court rules explain that a complaint need only "give the defendant specific facts of the complaint; that the plaintiff merely be

given fair notice of what the claim is and the grounds on which it rests. Where in actuality, the relief/response sought will be obtained through a court of law and its evidence.

Plaintiff, Jacqueline S Judd has specifically identified the actions or lack thereof, of Defendant, House of Representative Cynthia Lummis, and how those actions, lack thereof are wrongful toward/against, and the people of Wyoming, of the United States of America. Finally the Plaintiff, Jacqueline S Judd clearly states on fair notice the charges in question from the Writ of Mandamus, and to the responses of the violations and reasons for hearing.

### **Summary**

In Summary, the Plaintiff, Jacqueline S Judd fully complies with the pleading requirements of Federal Rule of Civil Procedure 8(a) and provides Defendant House of Representative Cynthia Lummis fair notice of the charges against her and the grounds thereof. Discovery and argument will add further detail later of facts in support of actual, realistic, and honest evidence. Therefore, the Plaintiff Jacqueline S Judd respectfully requests that the Court deny Defendants' Motion to Dismiss the Defendant, House of Representative Cynthia Lummis with Prejudice; and grant the motion for hearing as requested from the onset of the Petition of Writ of Mandamus.

  
PLAINTIFF

7-14-15  
DATE